

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (NEWARK)

Caption in Compliance with D.N.J. LBR 9004-1
2015-0900

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Attorney for Wells Fargo Bank, N.A.

In Re:

Charles Braswell

Valerie Braswell

Case No.: 19-19407-JKS

Chapter: 13

Hearing Date: June 4, 2019 at 10:00 am

Judge: Honorable John K. Sherwood

Oral Argument Waived

**NOTICE OF CROSS-MOTION FOR ORDER CONFIRMING NO STAY IS IN
EFFECT AND ALLOWING PROSPECTIVE IN REM RELIEF AS
TO REAL PROPERTY**

Charles Braswell
65 Werner Place
Teaneck, NJ 07666

Valerie Braswell
65 Werner Place
Teaneck, NJ 07666

Marie-Ann Greenberg, Trustee
30 Two Bridges Road, Suite 330
Fairfield, NJ 07004

Leressa Crockett, Esquire
76 South Orange Plaza, #103
South Orange, NJ 07079

PLEASE TAKE NOTICE that the undersigned attorney for Wells Fargo Bank, N.A. will apply to the United States Bankruptcy Court located at 50 Walnut Street, 3rd Floor, Newark, New Jersey, for an Order to confirm that no stay is in effect and allow prospective in rem relief to authorize the cross-moving party to prosecute a foreclosure action for the reason that the debtors have abusively utilized the bankruptcy process, as more particularly set forth in the certification submitted herewith.

TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-1(a) the cross-moving party shall be relying upon the Certification and Brief in support filed herewith to provide the facts supporting the requested relief. The property involved is known as 65 Werner Place, Teaneck, NJ 07666-4701.

/s/ William M. E. Powers III

William M. E. Powers III

Attorney for Wells Fargo Bank, N.A.

Dated: May 22, 2019